

EXHIBIT LL



POM 903

Filling Schedule II

Prescriptions

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Application

This Procedure applies to all pharmacy associates within Wal-Mart Stores, Inc. and its U.S. subsidiaries ("Walmart"), including Sam's Club and Puerto Rico.

Overview

In order to maintain the security of controlled substances during the dispensing process, pharmacy associates must follow the procedures outlined below to properly dispense Schedule II Prescriptions

The following topics are covered within this Procedure:

- Pharmacies utilizing paper logbook
- Pharmacies utilizing digital CII log book
- Accountability

Pharmacies Utilizing Paper Logbook

Filling Schedule II Prescriptions

If an order contains a Schedule II drug, process all other prescriptions in the order first. In the example below, the filling associate would fill all other prescriptions, including any compounded prescriptions, before selecting the Schedule II prescription.

Example: Prescription Order	4453378 APAP/CODE 6899751 OMEPRAZOL 8885288 ONE TOUCH 2205246 ACTIQ 2205245 OXYCOD/AP 6899753 COMPOUND	
	ENTER-Selects Fill	

Procedure— CII Paper log book

Follow these steps to fill Schedule II prescription(s):

Step	Action Required
1	The filling associate will notify the pharmacist a Schedule II medication requires filling. The filling Associate should also gather the appropriate CII logbook to place at the designated filling area. The designated filling area is defined as a single pod that has been identified as having adequate camera coverage to verify the filling process. In the absence of filling pods, the filling area should be designated as the front counter beside a pharmacist.
2	The pharmacist unlocks the Schedule II drawer and retrieves the stock bottle.



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Only one Schedule II medication (same drug / strength) should be removed from the drawer and dispensed at any given time. If another order for the same drug / strength appears on an associate's filling screen, the associate must wait to fill that drug order until the first order involving that CII has been completed and the stock bottles (same drug /strength) have been returned to the CII cabinet.

- 3** Pharmacist closes and re-locks the Schedule II drawer.
- 4** Pharmacist holds the stock bottle while the technician scans the NDC with the handheld SFA unit.
- 5** If the correct NDC scans, the pharmacist will hand the scanned bottle to the technician for filling.
- 6** The filling technician will scan the label printer located at the designated filling area.
- 7** The filling technician will count/pour the appropriate number of units. If the scanned container has an insufficient number of units to complete the order:
 - The technician shall inform the pharmacist of the additional quantity required to fill the prescription.
 - The pharmacist shall open the Schedule II drawer and retrieve another bottle(s) to complete the order.
 - The pharmacist will compare and validate that the NDC numbers of both the previously scanned container and the additional stock container(s) are identical.
 - The pharmacist shall close and relock the Schedule II drawer.

The technician shall compare the color, size and shape of the contents of additional container with those of the previously scanned container's contents on the counting tray as a quality check.

- 8** The filling technician will pour the counted/measured units into the appropriate vial/container and cap.
- 9** The filling technician will place the printed label on the vial/container.
- 10** The filling technician should record in the CII Log Book the following columns:
 - The prescription number
 - The date of dispensing
 - The quantity dispensed
 - The initials of the filling technician

[\(Click here to retrieve blank C II log book pages\)](#)



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- 11 The filling technician will place the completed vial/container along with the Schedule II stock container(s) used to fill the order into the hanging bag along with the patient's other medications in that order, and place the bag on the appropriate Visual Verify rack. The filling technician should return the CII logbook to its appropriate location.
- 12 At the pharmacist's Visual Verification, the pharmacist will retrieve the CII Log Book.
- 13 The pharmacist will **double count** the medication and circle the quantity on the label.
- 14 The pharmacist will then back count the remaining tablets in the CII stock bottle(s) used and record this quantity in the column labeled "*Back count Quantity in Bottle*" of the CII Log book
- 15 The pharmacist will verify the total balance of product on-hand and log the total count in the "*Balance*" column of the CII Log book.
- 16 The pharmacist will compare and validate that the ConnexUs system on-hand and the Schedule II Log book "*Balance*" column match.

Note:

 - If a discrepancy is discovered, please contact your Health and Wellness Market Leader.
 - The Controlled Substance Incident Report in Archer must be submitted when a discrepancy is identified as outlined in POM 813.
- 17 Follow the bagging procedure outlined in POM 1010.
- 18 Pharmacist unlocks Schedule II drawer and returns the stock bottle(s) and relocks the Schedule II drawer.
- 19 Repeat Steps 2 – 18 for any remaining Schedule II drugs in the order.

Pharmacies Utilizing Digital CII Logbook

Filling Schedule II Prescriptions

If an order contains a Schedule II drug, process all other prescriptions in the order first. In the example below, the filling associate would fill all other prescriptions, including any compounded prescriptions, before selecting the Schedule II prescription.



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Example: Prescription Order	4453370 APAP/CODE 6899751 OMEPRAZOL 8885288 ONE TOUCH 2285246 ACTIQ 2285245 OXYCOD/AP 6899753 COMPOUND ENTER-Selects Fill
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Procedure – CII Digital Logbook

Step	Action Required
1	The filling associate will notify the pharmacist when a Schedule II medication requires filling. The designated filling area is defined as a single pod that has been identified as having adequate camera coverage to verify the filling process. In the absence of filling pods, the filling area should be designated as the front counter beside a pharmacist.
2	The pharmacist unlocks the Schedule II drawer and retrieves the stock bottle. Only one Schedule II medication (same drug / strength) should be removed from the drawer and dispensed at any given time. If another order for the same drug / strength appears on an associate's filling screen, the associate must wait to fill that drug order until the first order involving that CII has been completed and the stock bottles (same drug /strength) have been returned to the CII cabinet.
3	Pharmacist closes and re-locks the Schedule II drawer.
4	Pharmacist holds the stock bottle while the technician scans the NDC with the handheld SFA unit.
5	If the correct NDC scans, the pharmacist will hand the scanned bottle to the technician for filling.
6	The filling technician will scan the label printer located at the designated filling area.
7	The filling technician will count/pour the appropriate number of units. If the scanned container has an insufficient number of units to complete the order: <ul style="list-style-type: none"> • The technician shall inform the pharmacist of the additional quantity required to fill the prescription. • The pharmacist shall open the Schedule II drawer and retrieve another bottle(s) to complete the order. • The pharmacist will compare and validate that the NDC numbers of both the previously scanned container and the additional stock



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container(s) are identical.

- The pharmacist shall close and relock the Schedule II drawer.

The technician shall compare the color, size and shape of the contents of additional container with those of the previously scanned container's contents on the counting tray as a quality check.

- 8** The filling technician will pour the counted/measured units into the appropriate vial/container and cap.
- 9** The filling technician will place the printed label on the vial/container.
- 10** The filling technician will place the completed vial/container along with the Schedule II stock container(s) used to fill the order into the hanging bag along with the patient's other medications in that order, and place the bag on the appropriate Visual Verify rack.
- 11** The pharmacist will **double count** the medication and circle the quantity on the label.
- 12** Follow the bagging procedure outlined in POM 1010.
- 13** Pharmacist unlocks Schedule II drawer and returns the stock bottle(s) and relocks the Schedule II drawer.
- 14** Repeat Steps 2 – 14 for any remaining Schedule II drugs in the order.

Procedure – CII NTC Audits With Digital Logbook

When prompted by ConnexUs, the pharmacist will unlock the CII drawer and retrieve the medication, then count all the on-hand tablets/capsules/liquid and record this quantity in the digital CII logbook, using the Cycle Count screen “Back Count” section. The pharmacist must include all Hazwaste and expired CIIs when completing this step.

Note:

- If a discrepancy is discovered, please contact your Market Health and Wellness Market Leader.
- The Controlled Substance Incident Report in Archer must be submitted when a discrepancy is identified as outlined in POM 813.

Conclusion

The proper handling of Schedule II medications during the filling process ensures accurate dispensing of the product and minimizes the risk of drug diversion. All Walmart/Sam's Club Pharmacists and Technicians are responsible for ensuring the process outlined in this POM regarding handling, dispensing and documentation of dispensing for all Schedule II products is followed at all the times.



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Accountability

Associates who do not comply with this Policy and Procedure are subject to discipline, up to and including termination.